

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

APR 02 2014

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

YOLANDA RICE,)

Defendant.)

CRIMINAL NO. 13 - 30254 - DRH

Title 18, United States Code, 1347
Title 21, United States Code, 843(a)(3)

STIPULATION OF FACTS


The government and the defendant stipulate to the following:

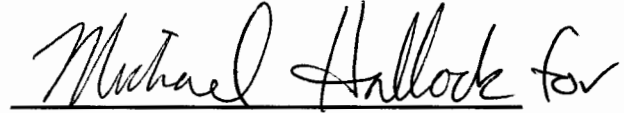
1. From in or around May 2011 through September 12, 2012, defendant Yolanda Rice did knowingly and willfully execute a scheme to defraud a health care benefit program, namely Medicaid, in connection with the delivery of and payment for healthcare benefits and services, by authorizing through her employer, Master Medical Care and Khaja Mohsin MD, materially false prescriptions for controlled substances for Medicaid beneficiaries, and then diverting the controlled substances to herself; thereby causing false claim submissions to the Illinois Medicaid Program.
2. The Illinois Medicaid Program paid approximately \$1,884.59 in fraudulent prescription claims for controlled substances caused by Rice.
3. That on November 30, 2011, Yolanda Rice, through fraud and misrepresentation, knowingly and intentionally obtained 180 pills of Oxycodone, a Schedule II controlled substance.

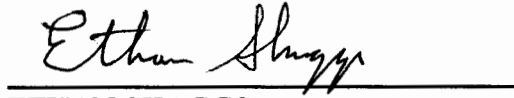
4. That on December 31, 2011, Yolanda Rice, through fraud and misrepresentation, knowingly and intentionally obtained 180 pills of Oxycodone, a Schedule II controlled substance.

IT IS SO STIPULATED.

STEPHEN R. WIGGINTON
United States Attorney


YOLANDA RICE
Defendant


RANLEY R. KILLIAN
Assistant United States Attorney


ETHAN SKAGGS
Attorney for Defendant

Date: 4/2/14

Date: 4/2/14